

Robert C. Hilliard (*pro hac vice* admission pending)

HILLIARD MUÑOZ GONZALES LLP

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Attorney for Hilliard Pre-Closing Accident Plaintiffs

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re: : Chapter 11
MOTORS LIQUIDATION COMPANY, et al., : Case No.: 09-50026 (MG)
f/k/a General Motors Corp., et al., :
: Debtors. : (Jointly Administered)
-----X

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF DOCUMENTS**

PLEASE TAKE NOTICE that the attorney set forth below hereby appears as counsel for Hilliard Pre-Closing Accident Plaintiffs in the above-captioned Chapter 11 bankruptcy cases pursuant to Rules 2002, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure, and request that all notices and pleadings given or required to be given, and all papers served or required to be served, be given and served upon the following:

Robert C. Hilliard
Hilliard Muñoz Gonzales LLP
719 S Shoreline Boulevard
Corpus Christi, TX 78401
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Fax: (361) 882-3015
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PLEASE TAKE FURTHER NOTICE that the undersigned consents to e-mail service.

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only notices and papers referred to in the above-mentioned Bankruptcy Rules, but also includes,

without limitation, all orders, applications, motions, petitions, pleadings, requests or demands, hearings, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other document (including, without limitation, operating reports, statements of affairs, schedules of assets and liabilities, disclosure statements and/or plans of reorganization) filed with, or otherwise brought before, this Court with respect to the above-captioned cases, whether formal or informal, written or oral, and transmitted or conveyed by mail delivery, courier service, telephone, facsimile transmission or otherwise.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance is not consent or submission by Hilliard Pre-Closing Accident Plaintiffs to personal or subject matter jurisdiction, and this Notice of Appearance and any subsequent appearance, pleading, claim or suit is not intended nor shall be deemed to waive Hilliard Pre-Closing Accident Plaintiffs' (i) right to have final orders in non-core matters entered only after *de novo* review by a district court judge; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; and (iv) other rights, claims, actions, defenses, setoffs or recoupments to which Hilliard Pre-Closing Accident Plaintiffs are or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are hereby expressly reserved.

Dated: August September 11, 2017
Corpus Christi, TX

Respectfully submitted,

/s/ Robert C. Hilliard

Robert C. Hilliard

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*Attorney for Hilliard Pre-Closing Accident
Plaintiffs*

CERTIFICATE OF SERVICE

I, Robert C. Hilliard, hereby certify that a true and correct copy of the foregoing *Notice of Appearance and Request for Service of Documents* will be forwarded by electronic transmission to all parties registered to receive electronic notice in these cases, as identified on the Notice of Electronic Filing (NEF), via this Court's CM/ECF system on September 11, 2017.

/s/ Robert C. Hilliard

Robert C. Hilliard